In re: Anderson et al. Filed: November 1, 1999

Serial No.: 09/431,017

Page 24

## REMARKS

This is a complete response to the outstanding non-final Office Action mailed April 20, 2005. Claims 1, 5, 6, 13, 25, 28, 33, and 35 have been amended; claims 4 and 34 have been canceled herein. No new matter has been added. Upon entry of the enclosed claim amendments, claims 1, 5-25, 27-33, and 35-36 remain pending in the present application.

The Applicant traverses all of the rejections of the Office Action. Applicant appreciates the Examiner's review of the above-identified patent application and respectfully requests reconsideration and allowance in view of the above amendments and following remarks.

## I. Response to claim rejections based on obviousness

In the Office Action, claims 1, 5-25, 27-33, and 35-36 have been preliminarily rejected as obvious under 35 U.S.C. § 103. Specifically claims 1, 5-25, 27-33, and 35-36 have been rejected under 35 U.S.C. § 103 by U.S. Patent No. 5,594,791 to Szlam et al. (hereinafter, "Szlam") in view of U.S. Patent No. 5,784,452 to Carney (hereinafter, "Carney").

Applicant's amended claim 1 recites,

In re: Anderson et al. Filed: November 1, 1999

Serial No.: 09/431,017

Page 25

"...displaying said call center statistics from said plurality of different types of resources..."
(Emphasis Added)

The Applicant respectfully submits that the cited references Szlam in view of Carney fail to teach all of the elements of the amended claim 1 for at least the reasons that follow. Szlam discloses general campaign statistics (col. 18, lines 51-60) and does not disclose, teach, or suggest statistics specific to the different types of resources. General campaign statistics do not provide the benefits that aid a system or user in managing the call center resources.

Carney does not cure this defect. Carney does disclose statistics for different agents. However, Carney only discloses statistic for agents, a single type of call center resource. Carney does not disclose, teach, or suggest displaying statistics for other types of call center resources. Applicant's claimed invention provides a user or system with statistics for different types of resources allowing the system or user to best determine and utilize the call center resources between the various campaigns.

Carney does not teach or suggest displaying statistics for

In re: Anderson et al.

Filed: November 1, 1999

Serial No.: 09/431,017

Page 26

other types of call center resources. Carney discloses statistic for agents, which are human and subject to inconsistent performance. Carney does not acknowledge or suggest any benefits of displaying statistics for hardware resources that perform in a consistent manner. Therefore it would not be obvious for Carney to display statistics for different types of campaign resources. Therefore, Applicant requests that the Examiner withdraw the

Amended independent claims 5, 6, 13, 25, and 28, 33, and 35 also recite claim elements similar to the displaying of call center statistics for a plurality of different types of resources as disclosed in claim 1. Therefore for the same reasons as previously submitted in regards to claim 1 and since U.S. Patent No. 5,465,286 to Clare et al. does not cure the defect, Applicant requests that the Examiner withdraw the rejections of claims 5, 6, 13, 25, 28, 33, and 35. 33, and 35.

## II. Prior Art Made of Record

rejection of claim 1.

The prior art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

In re: Anderson et al. Filed: November 1, 1999 Serial No.: 09/431,017

Page 27

## CONCLUSION

In light of the foregoing comments and for at least the reasons set forth above, Applicant respectfully submits that all rejections have been traversed, rendered moot and/or accommodated, and that presently pending claims 1, 5-25, 27-33, and 35-36 are in condition for allowance. Favorable reconsideration and allowance of the present application and the presently pending claims are hereby courteously requested. The Examiner is telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

Respectfully submitted,

Anderson et al.

Andrew R. Martin Registration No. 45,413

Attorney for Applicants

BOURQUE & ASSOCIATES, P.A. 835 Hanover Street, Suite 301 Manchester, New Hampshire 03104

Telephone: (603) 623-5111 Facsimile: (603) 624-1432